

1 Dale K. Galipo, Esq. (SBN 144074)  
dalekgalipo@yahoo.com  
2 Renee V. Masongsong, Esq. (SBN 281819)  
rvalentine@galipolaw.com  
3 **LAW OFFICES OF DALE K. GALIPO**  
4 21800 Burbank Blvd., Suite 310  
Woodland Hills, CA91367  
5 Tel: (818) 347-3333  
6 Fax: (818) 347-4118

7 Sharon J. Brunner, Esq. (SBN 229931)  
sharonjbrunner@yahoo.com  
8 **LAW OFFICE OF SHARON J. BRUNNER**  
14393 Park Ave., Suite 101  
Victorville, CA 92392  
9 Tel: (760) 243-9997  
10 Fax: (760) 843-8155

11 James S. Terrell, Esq. (SBN 170409)  
**LAW OFFICE OF JAMES S. TERRELL**  
15411 Anacapa Road  
Victorville, CA 92392  
12 Tel: (760) 951-5850  
13 Fax: (760) 952-1085

14 *Attorneys for Plaintiff, Justin Cody Harper*

15  
16 **UNITED STATES DISTRICT COURT**  
17 **CENTRAL DISTRICT OF CALIFORNIA**  
18

19 JUSTIN CODY HARPER,

20 Plaintiff,

21 vs.

22 CITY OF REDLANDS, REDLANDS  
23 POLICE DEPARTMENT, POLICE  
OFFICER KOAHU, AND DOES 1-  
24 10, INCLUSIVE,

25 Defendants.

Case No. 5:23-cv-00695-SSS-DTB

*Assigned to:*

Hon. District Judge Sunshine S. Sykes  
Hon. Mag. Judge David T. Bristow

**JOINT STIPULATION AND  
REQUEST TO CONTINUE THE  
PRETRIAL FILING DEADLINES**

26 COME NOW Plaintiff Justin Harper and Defendants City of Redlands and Nicholas  
27 Koahu and hereby stipulate and request as follows:  
28

- 1       1. On February 12 and 13, 2025, counsel for Defendants and counsel for  
2       Plaintiff met and conferred regarding the upcoming pretrial filings, including  
3       the Parties' motions in limine. During the meet and confer, counsel discussed  
4       their upcoming trial schedules and Defendants' pending Motion for Summary  
5       Judgment.
- 6       2. Currently, Defendants' Motion for Summary Judgment is set to be heard on  
7       February 28, 2025.
- 8       3. The Parties submit that GOOD CAUSE exists to modify the pretrial filing  
9       schedule, as follows:
  - 10           a. Plaintiffs' counsel, Dale K. Galipo and Renee V. Masongsong, will be  
11           engaged in trial beginning February 18, 2025, in the case *Lennox v.*  
12           *State of California*, et al., Case No. 2:21-cv-02075-DAD-KJN. This  
13           case is in the Eastern District of California in front of Judge Dale  
14           Drozd.
  - 15           b. Defendants' counsel, James Touchstone, will be engaged in trial  
16           beginning on February 24, 2025, in *Estate of Escobedo v. City of Los*  
17           *Angeles, et al.*, Los Angeles Superior Court Case No. 19STCV43741 in  
18           Department 72 before Judge Joseph Lipner.
- 19       4. Additionally, the Parties noticed that two trials are scheduled to take place in  
20       front of this Court starting on April 21, 2025—the above-captioned case  
21       (*Harper*) and *Nunez v. County of San Bernardino*, Case No. 5:22-cv-01934-  
22       SSS-SPx. The Parties are not opposed to continuing the *Harper* trial if the  
23       *Nunez* trial goes forward as scheduled.
- 24       5. THEREFORE, the Parties jointly request that this Court modify the pretrial  
25       filing schedule as follows:

26           //

27           //

Event	Current Date	Proposed Date
Last Day to File Motions in Limine	2/21/25	3/7/25
Last Day to Exchange Proposed Jury Instructions	2/28/25	3/14/25
Last Day to Exchange Objections to Jury Instructions; Last Day to File MCFL, Witness Lists, Joint Exhibit List, Joint Status Report re Settlement, and Oppositions to Motions in Limine	3/7/25	3/21/25
Last Day to File Joint PPTCO, Jury Instructions, Verdict Forms, Statement of the Case	3/21/25	No change
Hearing on Motions in Limine	3/28/25	4/4/25

IT IS SO STIPULATED.

DATED: February 13, 2025

LAW OFFICES OF DALE K. GALIPO

By: /s/ Dale K. Galipo

Dale K. Galipo  
Renee V. Masongsong  
Attorney for Plaintiff

1 DATED: February 13, 2025

JONES MAYER LAW

2 By: /s/ Scott Wm. Davenport

3 Scott Wm. Davenport

4 Attorney for Defendants

5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28